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JOSE FERNANDO GOMEZ-MOREIRA

7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JOSE FERNANDO GOMEZ-MOREIRA,

15 Defendant.

Case No. 1:20-cr-00151-JLT

STIPULATION TO EXTEND
COMPASSIONATE RELEASE
BRIEFING SCHEDULE;
[PROPOSED] ORDER

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17 The defendant, Jose Fernando Gomez-Moreira, filed a *pro se* 18 U.S.C. § 3582(c) motion
18 on March 3, 2023, and was appointed counsel. A briefing schedule was established where the
19 defendant's counsel filed a supplement to the defendant's motion on July 13, 2023. The
20 government's response is currently due by August 18, 2023, and the defendant's reply is due on
21 September 1, 2023. The government received the defendant's updated Bureau of Prisons'
22 records on August 15, 2023, and requires more time to review and follow-up on those records
23 before filing its response.

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Therefore, **IT IS HEREBY STIPULATED** between the parties that briefing schedule may be extended as follows:

September 1, 2023: Government's response to the defendant's motion is due; and

September 15, 2023: Defendant's reply is due.

Respectfully submitted,

PHILLIP TALBERT
United States Attorney

DATED: August 16, 2023

By: /s/ Joseph Barton
JOSEPH BARTON
Assistant United States Attorney

HEATHER E. WILLIAMS
Federal Defender

DATED: August 16, 2023

By: /s/ Laura Myers
LAURA MYERS
Assistant Federal Defender
Counsel for Jose Fernando Gomez-Moreira

[PROPOSED] ORDER

The foregoing Stipulation, by and among counsel for the government and Defendant Gomez-Moreira, is hereby APPROVED.

IT IS SO ORDERED.

Dated: **August 16, 2023**


UNITED STATES DISTRICT JUDGE